

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GARY NAHAM)	
)	
Plaintiff,)	
)	08 C 519
v.)	
)	Judge Andersen
CITY OF CHICAGO, et. al.)	
)	Magistrate Judge Mason
Defendants.)	

**CITY OF CHICAGO'S AGREED MOTION TO EXTEND
THE TIME IN WHICH TO ANSWER OR OTHERWISE PLEAD**

Defendant, the City of Chicago (“City”), by its attorney, Mara S. Georges, Corporation Counsel, respectfully asks this Honorable Court for an extension of time up to, and including, May 1, 2008, in which to answer or otherwise plead to plaintiff’s complaint. In support of this motion, the City states:

1. This matter was filed on January 23, 2008, in the United States District Court, Northern District of Illinois. On February 11, 2008, Corporation Counsel for the City received a copy of the waiver and the complaint.
2. The undersigned was assigned to the case on March 31, 2008, and has not yet received any of the Chicago Police Department records to enable Defendant to properly respond to plaintiff’s complaint.
3. This motion is the City’s first request for an extension of time to answer or otherwise plead. Such a request will not unduly delay the resolution of the disputed issues, nor will it prejudice the plaintiff.
4. Plaintiff’s counsel was informed of this motion on April 1, 2008, and agreed

with its terms on April 2, 2008.

WHEREFORE, Defendant City, respectfully asks for an order extending the time to answer or otherwise plead to May 1, 2008.

Respectfully Submitted,

MARA S. GEORGES
CORPORATION COUNSEL
CITY OF CHICAGO

BY: /s/ Helen C. Gibbons
HELEN C. GIBBONS
Assistant Corporation Counsel
Attorney for Defendant City

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Suite 1020
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Attorney No. 06292881

CERTIFICATE OF SERVICE

I hereby certify that I have caused true and correct copies of the above and foregoing Motion and Notice of Motion to be served upon all parties of record pursuant to ECF, in accordance with the rules of electronic filing of documents, on this 3st day of April, 2008.

/s/ Helen C. Gibbons
HELEN C. GIBBONS